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April 14, 2021

Jocelyn Boyd  
Chief Clerk and Administrator  
South Carolina Public Service Commission  
Synergy Business Park, The Saluda Building  
101 Executive Center Drive  
Columbia SC 29210

Re: Public Service Commission Review of South Carolina Code of Regulations Chapter 103  
Pursuant to S.C. Code Ann. Section 1-23-120(J)  
Docket No. 2020-247-A

Dear Ms. Boyd:

Attached for filing on behalf of Lockhart Power Company, please find the Reply Comments of Lockhart Power Company on Article 3 (Electric Service) of the Commission's regulations.

Thank you for your assistance in this matter.

Very truly yours,

BURR & FORMAN LLP

Margaret M. Fox

MMF/khh

cc: All parties of Record (via e-mail)

Attachment

THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
DOCKET NO. 2020-247-A

In the Matter of:	)	
	)	
Public Service Commission Review of	)	
South Carolina Code of Regulations	)	REPLY COMMENTS OF
Chapter 103 Pursuant to S.C. Code Ann.	)	LOCKHART POWER COMPANY
Section 1-23-120(J)	)	
_____	)	

Pursuant to the Notice of Review filed in the above-referenced docket, Lockhart Power Company (“LCP”) respectfully submits the following Reply Comments on Article 3 (Electric Service) of the Commission’s regulations.

**Comments of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC**

**(“Duke”)**

1. Duke’s comments regarding Reg. 103-321 (Meter Requirements), Reg. 103-322 (Meter Reading Data), and Reg. 103-339 (Customer Billing) consist mainly of edits to recognize Duke’s Advanced Metering Infrastructure (“AMI”) technology. LPC does not object to these changes, provided they are in addition to the current technology that LPC uses.

2. Duke’s edits to Reg. 103-330.f (Customer Information) do not take into account the fact that some utilities such as LPC still maintain a physical office. While we agree the regulation should take into consideration utilities like Duke who no longer do so, we suggest the following edits to encompass both scenarios:

f. Post a notice in a conspicuous place on the utility's website or in each office of the electrical utility where applications for service are received, informing the public that copies of the rate schedules and rules relating to the service of the electrical utility, as filed with and approved by the commission are available for inspection or download.

3. Duke's edits to Reg. 103-352 (Procedures for Termination of Service) are also directed toward recognizing Duke's use of AMI technology. While LPC has no objection to the proposed changes, LPC has no concerns with the regulation as it currently reads.

4. LPC is in agreement with Duke's proposed edits to Reg. 103-370 (Electrical Utility Inspection and Tests) and Reg. 103-373 (Test Procedures and Accuracies), which would conform those regulations to current practice and standards.

**Comments of Dominion Energy South Carolina, Inc. ("DESC")**

1. As noted above, LPC agrees that the regulations should acknowledge that some utilities do not maintain business offices in South Carolina, while not changing the regulations as they relate to those that do.

2. LPC agrees with DESC that the regulations should be revised to the extent necessary to recognize that customers often choose to receive communications from the utility via electronic means, and to ensure such preferences can be honored.

3. LPC agrees that it would be appropriate to revise the regulations to allow for cloud-based electronic records retention.

**Comments of South Carolina Department of Consumer Affairs**

1. The Department of Consumer Affairs (“DCA”) commented on a number of electric service regulations. In general, LPC believes the existing regulations are sufficient to protect consumers. LPC notes additionally that, as a small electrical utility, it would be disproportionately burdened by those recommendations that would require changes to long-established processes and timeframes.

2. With respect to the suggestion that the sixty-day timeframe contained in Reg. 103-330 be shortened, LPC does not believe that is necessary. LPC works with all customers to make the determination of the appropriate rate for them at the time of application for residential and small commercial customers, or well before the decision is made to locate within LPC’s service territory for industrial customers.

3. With respect to DCA’s suggestion to provide additional time prior to terminating service, LPC notes that by the time a customer’s service is scheduled for termination, the customer’s bill is already more than 30 days past due, and the Company currently is required to give an additional ten days notice prior to termination, for a total of forty days at a minimum. The actual time is typically longer, as the Company works with customers to address past due balances before terminating service, including offering extended payment plans when appropriate. Lengthening those timeframes can actually harm customers by allowing additional amounts to accrue before they are addressed and resolved.

Respectfully submitted,



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